

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

BASCOM GLOBAL INTERNET SERVICES,
INC.,

Plaintiff,

v.

AT&T CORP.,

Defendant.

Civil Action No. 3:14-cv-3942-M

JURY TRIAL DEMANDED

BASCOM'S MOTION TO COMPEL

For the reasons set forth in the accompanying memorandum of law in support, plaintiff BASCOM Global Internet Services, Inc. ("BASCOM") respectfully moves the Court for an order compelling AT&T Corp. ("AT&T") to (1) produce relevant and responsive licenses; (2) produce unredacted versions of documents that AT&T either redacted or withheld completely for confidentiality; (3) produce e-mail responsive to BASCOM's final e-mail requests; (4) produce information depicting the number of seat licenses sold and volume of requests for the accused products; and (5) provide access to the accused offerings.

This motion is accompanied by BASCOM's Memorandum of Law in Support of Motion to Compel.

Dated: December 18, 2017

Respectfully submitted,

By: /s/ Arun Subramanian

Arun S. Subramanian
(admitted *pro hac vice*)
New York State Bar No. 4611869
asubramanian@susmangodfrey.com

Tamar Lusztig
(admitted *pro hac vice*)
New York State Bar No. 5125174
tlusztig@susmangodfrey.com

SUSMAN GODFREY LLP
654 Madison Avenue
New York, New York 10065
Telephone: (212) 336-8330

Daniel J. Shih
(admitted *pro hac vice*)
Washington State Bar No. 37999
dshih@susmangodfrey.com

Jordan W. Connors
(admitted *pro hac vice*)
Washington State Bar No. 41649
jconnors@susmangodfrey.com

SUSMAN GODFREY LLP
1201 Third Avenue, Suite 3800
Seattle, Washington 98101
Telephone: (206) 516-3880

Terrell W. Oxford
Texas State Bar No. 15390500
toxford@susmangodfrey.com

Jeffrey David
(admitted *pro hac vice*)
Texas State Bar No. 24053171
jdavid@susmangodfrey.com

SUSMAN GODFREY LLP
1000 Louisiana Street, Suite 5100
Houston, TX 77002
Telephone: (713) 651-9366

Richard A. Sayles
Texas State Bar No. 17697500
dsayles@swtriallaw.com

Mark D. Strachan
Texas State Bar No. 19351500
mstrachan@swtriallaw.com

SAYLES | WERBNER, P.C.
1201 Elm Street, Suite 4400
Dallas, Texas 75270
Telephone: (214) 939-8700

**ATTORNEYS FOR PLAINTIFF
BASCOM GLOBAL INTERNET
SERVICES, INC.**

CERTIFICATE OF CONFERENCE

I hereby certify that, as described and shown in the supporting memorandum and accompanying appendix, counsel for BASCOM and counsel for AT&T met and conferred regarding the issues raised in BASCOM's motion multiple times, telephonically and by e-mail. In addition, before filing the instant motion, BASCOM provided counsel for AT&T a draft motion and an opportunity to confirm it would provide the requested information or otherwise respond.

/s/ Tamar Lusztig
Tamar Lusztig

CERTIFICATE OF SERVICE

I hereby certify that on December 18, 2017, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system.

/s/ Tamar Lusztig
Tamar Lusztig